Kingcome Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input that has been received on the Timber Supply Review in the Kingcome Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Kingcome Timber Supply Area

Background

As part of the review of timber supply in the Kingcome Timber Supply Area, the British Columbia Forest Service distributed the *Discussion Paper* and two technical reports—the *Timber Supply Analysis* and the *Socio-Economic Analysis*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90–day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Sunshine Coast Timber Supply Area.

The first section of this summary, Public Review Process and Response, outlines the public review process implemented by the Forest Service and describes the types of public input received. The second section, Public Input, summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Port McNeill Forest District office.

Public Review Process and Response

Port McNeill District Staff actively solicited public input on the Timber Supply Review in the Kingcome Timber Supply Area through the following actions:

- copies of the three documents and a letter with the dates and locations of open houses were mailed to over 200 stakeholders, including First Nations, town councils, regional districts, labour groups, Small Business Forest Enterprise Program registrants, logging contractors, major licensees, and chambers of commerce. The *Discussion Paper* included a response form that readers were encouraged to complete and return to the district manager
- eleven information sessions were held with representatives from the forest industry, labour, local governments and other interest groups (see Table 1). Some of these were held at the request of the group
- six open houses were held following extensive advertisements in four local newspapers
- the Timber Supply Review for the Kingcome Timber Supply Area was featured on Canada AM, CBC Radio news and B.C. Report
- the North Island Gazette provided extensive coverage, and articles also appeared in several provincial newspapers

As Table 1 shows, many individuals attended the information sessions and the open houses. The Port McNeill Forest District also received five completed response forms and eighteen written submissions, some which were supported by additional technical data (see Appendix 1). The Kingcome Licensees also commissioned Timberline Forest Inventory Consultants to undertake an independent timber supply analysis. That document—the *Kingcome TSA Timber Supply Review Audit*—is referred to as the "licensee analysis" in this report. The Coast Forest and Lumber Association (CFLA) commissioned EB Experts Inc. & Clayton Resources Ltd. to review both the *Timber Supply Analysis* and the *Socio-Economic Analysis*. The resulting document—*Kingcome Timber Supply Area Timber Supply Review Choices for AAC: 1995-2000*—is referred to as the "CFLA report" in this document.

Activities (No. of participants)	Date
Meetings with interest groups	
Port McNeill (22)	Aug 16, 1995
Campbell River (4)	Aug 17, 1995
Regional Economic Development Commission (11)	Sept 11, 1995
District of Campbell River (2)	Sept 14, 1995
Major Licensees (7)	Sept 21, 1995
Interfor - Cleagh Creek Camp (65)	Oct 10, 1995
Mount Waddington Community Resources Board (20)	Oct 16, 1995
District of Port Hardy (13)	Oct 18, 1995
Truck Loggers Association Board of Directors (12)	Oct 20, 1995

Presentations on Visual Quality Objectives	
Mount Waddington Community Resources Board (14)	Nov 16, 1995
Town of Port McNeill (10)	Nov 21, 1995
Open Houses	
Campbell River (11)	Sept 14, 1995
Port Hardy (10)	Sept 20, 1995
Port McNeill (14)	Sept 21, 1995
Sointula (5)	Sept 27, 1995
Alert Bay (4)	Sept 28, 1995
Port Alice (7)	Oct 3, 1995

Table 1: Participation in public information sessions

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Kingcome Timber Supply Area is summarized under the following headings:

- Timber Supply Analysis
- Socio-Economic Analysis
- Discussion Paper

Public input on other ongoing government processes that may influence timber supply in the Kingcome Timber Supply Area in the future is summarized at the end of this section.

Timber Supply Analysis

Licensee analysis

The licensee analysis states that it identified a discrepancy in the size of the timber harvesting land while reproducing the Forest Service land base netdown procedures. According to the licensee analysis, the timber harvesting land base should be 5 per cent larger, thereby permitting an initial harvest of 1 122 000 cubic metres. This is 5 per cent higher than that indicated in the Forest Service analysis.

The licensee analysis presents some alternative interpretations of timber supply analysis inputs and the impact each of these have on the timber supply forecast. These changes include:

- redefining preservation visual quality objective areas as retention visual quality objective areas
- increasing the maximum disturbance percentages for visual quality areas
- reducing the regeneration delay to three years for all species
- using managed stand yield tables for the Timber Licence reversion areas

Using all of these inputs and the corrected land base, the licensee analysis indicates an initial harvest level of 1 282 300 cubic metres per year for the first decade is possible. This is 23 per cent below the current conventional harvest level of 1 658 770 cubic metres per year. The harvest level then declines by 10 per cent per decade for three decades to a low of 934 800 cubic metres per year. It then rises in decade 16 to the long term level of 992 900 cubic metres per year.

The licensee analysis indicates that further increases in timber supply could be possible if the following factors are proven to be feasible:

- inclusion of a portion of the Klinaklini watershed in the timber harvesting land base
- a 10 per cent increase in the area considered operable
- adjustment for negative bias in old-growth site productivity estimates.

The critique indicates that the cumulative impact of adjusting the above inputs and factors would be a 15 per cent reduction in the initial harvest level from the current AAC.

With the exceptions of the land base correction and the suggested changes to analysis inputs, recommendations were not provided to improve the data, assumptions or computer model used in the Forest Service analysis.

CFLA report

The CFLA report on the *Timber Supply Analysis* states that:

- short-term harvests are reduced to allow for larger harvests in the future.
- equal percentage declines per decade tend to reduce harvests more in the short term and defer smaller declines to the future
- timber harvesting land base reductions for non-timber values are treated as requirements

rather than choices, so there is no guarantee that the best decisions are being made.
- timber supply is reduced due to harvesting restrictions for non-timber values, yet there is no testing to see if the restrictions provide the best balance of outputs

The CFLA report asserts that the policies used to determine the shape of the base case harvest forecast are somewhat arbitrary, with no rationale or criteria provided to explain why some trade-offs are made and others are not. The report recommends that the Forest Service analyze the forest cover trade-offs that could be made in the short term to maintain a higher level of harvest than the base case.

Other Public Input

- **General**
  Industry input supports the suggestions made in the licensee analysis, and repeats points made in the CFLA report on the Forest Service analysis.

- **Size of the timber harvesting land base**
  One industry submission states that the reductions made for environmentally sensitive areas are high and that harvesting regulations under the Forest Practices Code might lessen the need for reductions.

  Another industry submission states current economic accessibility lines have changed substantially and estimates the operable land base has increased by 10 per cent. It plans to submit representative maps of this area (several mapsheets were received by the District at a later date).

- **Silviculture**
  One public submission maintains that the amount of silviculture being done is inadequate and that this may mean that the regeneration assumptions in the Forest Service analysis do not reflect actual practices.

- **Forest cover requirements**
  Two industry submissions note that the Forest Service analysis shows an 8 per cent increase above the base case if a three-pass system is modelled. They recommend that short-term violations of the adjacency requirements be allowed to provide for a transition period to move from the old development pattern to a four-pass system. Both also note the large positive impact that small reductions in green-up ages have on timber supply, and that a three-year reduction is possible with enhanced forestry. One submission states that the legislative and policy framework exists between the Forest Practices Code and the *Forest Act* to enable the government to vary green-up requirements.

  A public submission states that the prime considerations determining green-up time and cutblock adjacency should be protection of watershed stability, runoff etc.

- **Visual quality objectives**
  Three industry and one local government submission note that visual quality objectives have a significant impact on timber supply. They recommend that flexibility in the application of these requirements should be considered in the short term. The possibilities mentioned include:
  - relaxing the visual quality objectives until timber harvesting rates are stabilized, then reinstating them
  - re-evaluating the objectives to reduce the area in the more restrictive classifications
  - reducing the visual quality objectives in areas that are less travelled by tourists.

  One industry submission states the following:
  - the visual quality objectives need refining to remove the areas that are not visible from particular viewpoints. The company intends to map several sections of the coastline to determine what the actual visual quality objective areas should be
  - because the objectives were set without public input, it is possible that they are much more restrictive than they need to be. The company intends to poll the tourism industry, in particular the cruise ship component, to provide data

- clearcut shapes are now varied (i.e. no longer squares or rectangles) and small patches of timber are being left. This is a strong argument for modelling visual quality objectives to their upper limits.

Input from local government recommends that visual quality objectives be removed from resource management guidelines because of:

- the lack of detail on whose objectives they are and what standards are used to identify them, and
- the unnecessary unemployment and hardship they cause for resource-based communities.

The respondents urge more public debate on the issue.

A community submission states that since visual quality objectives were implemented before restrictions on cutblock size were introduced, they are now needed only on the most sensitive viewscapes. Moreover, the community resources board should be allowed to provide advice from local people on visual quality objectives in the Port McNeill forest district.

One submission cites the importance of maintaining visual quality along waterways, but states that the application of the objectives should not be extreme. It adds that reducing the number of straight boundaries on clearcuts would do much to minimize the visual impact of harvesting.

One submission from an environmental group states that the green-up and visual quality provisions were put into place to protect forest values such as landscape, soils, and salmon habitat, and therefore they are much needed.

Socio-Economic Analysis

CFLA report

The CFLA report states that the significance of an allowable annual cut reduction is minimized in the *Socio-Economic Analysis* because:

- the employment and income impacts of a harvest-level reduction are under-estimated, in part because the public sector is included in the basic sector of the economy. This reduces the significance of any single industry, including forestry, to the local economy. It is noted that this issue is recognized in the *Socio-Economic Analysis*
- potential harvest reductions are assessed against recent harvest levels rather than the current allowable annual cut
- background information on the size of the forestry sector is not presented in the same units as the impact estimates

The report further asserts that the environmental impacts are not assessed adequately because the conclusions drawn do not reflect the pros and cons presented. Instead, they rely upon the assumption that the lowest harvest rate would produce the lowest environmental impacts.

The report concludes that short-term departures from long-term preferred actions can sometimes be made rationally, if done in the best social and economic interests, and only when choices are limited.

Other public input

- **Employment and community impacts**
  One industry submission maintains that an allowable annual cut reduction of 35 per cent would cause at least 300 jobs to be lost in the company, and the closure of at least one mill. It contends that the use of person-years as a measure of employment causes an underestimate of the number of jobs and that the number of people employed on a yearly basis is higher than reported in the *Socio-Economic Analysis*.

Another industry submission also states that a cut reduction is likely to jeopardize jobs.

A local government submission expresses concern that the *Socio-Economic Analysis* does not adequately estimate the impacts of harvest reductions on local economies, and that it does not consider the cumulative effects of reductions in other timber supply areas.

An environmental group submission states that the *Socio-Economic Analysis* creates a fear that a drop in the harvest level will lead to local job losses, whereas with Forest Renewal B.C. there is reason to believe this will not be the case.

One public submission indicates that there is a large amount of backlog silviculture work that could be a source of employment and that the silviculture season must be lengthened as support from unemployment insurance is decreased.

Discussion Paper

- **Environmental and socio-economic objectives**
  One industry submission states that labour-intensive and value-added businesses should have a wood supply made available to them.

  Input from an environmental group states that more wood should be processed locally to retain and create jobs.

  The potential to increase awareness through education is mentioned in two submissions. One suggests educating people about what they can expect to see in the working forest landscape, compared to that in a park.

  One public submission states that there should be more selective cutting experiments, and more old growth preserved within easy access of the public. It asserts that integrated resource management would be much easier if money were not our first priority.

  One public submission recommends an old-growth inventory be done before an allowable annual cut is determined. It also urges that a calculation be performed of the number of trees needed for planting in order to have a sustainable industry.

  A community submission states that the government has made a commitment to the stability of forest-reliant communities and forest jobs, and that this should be honoured. It also calls for a new socio-economic analysis to be done to account for potential changes in the forest sector and land use.

- **Examining the area currently considered uneconomical to harvest**
  Two industry submissions (and supporting technical information/maps) identify the potential to increase timber supply with a partitioned cut if the Klinaklini area could be accessed.

  Others recommend that a partition for low sites or currently underutilized forest types be considered, with one respondent stating that this should be used to maintain the existing allowable annual cut for a licence that already targets those forests.

  One local government submission discusses the possibility that a community forest could help mitigate impacts through the use of low sites, uneconomical sites and partial cutting.

  An industry submission states that currently uneconomic sites should be made available as non-replaceable, rehabilitation forest management opportunities not attached to the allowable annual cut.

- **Partial Cutting**
  One industry submission maintains that the use of partial cutting would make available a large volume of timber currently unavailable due to visual quality requirements. Pictures showing selective logging at Chamiss Bay were submitted in which the author states that the viewscape is unaltered. The harvest level in visually sensitive areas could be based on performance, with a partitioned allowable annual cut.

- **Forest management issues**
  One industry submission stresses that issues like the old-growth site index and potential

increased yields from managed stands should be addressed now, with direction and commitment provided to ensure that the benefits are realized in the future.

- **Allowable annual cut adjustment**
  One submission from a local government opposes an allowable annual cut reduction made on the basis that the current forest management practices cannot be maintained. Concern is expressed that this will set a precedent for other timber supply areas and cause detrimental impacts on communities dependent on the forest industry.

  Other local government submissions state that flexibility should be allowed in the application of visual quality and adjacency/green-up requirements to enable a more gradual adjustment to the long-term harvest level. This approach will enable the government to maintain its commitment to the economic stability of forest-dependent communities, without compromising visual quality.

  Submissions from another local government and one industry group state that the CFLA report should be considered in determining the allowable annual cut.

  An environmental group stresses that the current guidelines should be maintained and that the reality of changed circumstances should be faced. Ignoring the current situation will only make things worse for future generations.

  Two industry submissions support a gradual step-down and transition period to enable industry to adjust to the impacts, with perhaps less disruption of the workforce. One of these submissions states that flexibility exists in the Forest Practices Code (Sections 3 and 8) and in forest cover guidelines to support an allowable annual cut that would minimize the short-term drop, and remove the mid-term trough, without sacrificing integrated resource management objectives. The long-term harvest level could also be increased if the right management strategies are implemented now. Another industry submission also maintains a gradual transition is possible if choices are made to minimize the social and economic impacts.

  Another industry submission agrees that relaxing forest cover requirements would make a more gradual reduction possible and provides the following rationale:
  - compared to the south, activities on northern Vancouver Island should concentrate more on the growing and harvesting of timber. The message should be that this activity helps support the standard of living in B.C.
  - the creation of the new parks should provide the areas for a substantial increase in tourism/recreation. The popularity of Whistler Mountain, in spite of the surrounding clearcuts, shows that forest cover is not always an indicator of tourism potential
  - there is evidence of a growing "industrial tourism" industry on the north end of Vancouver Island

  One industry submission contends that any reductions in the allowable annual cut should be made to the Small Business Forest Enterprise Program rather than to Forest Licensees. Licensees have come very close to meeting cut control requirements whereas the small business program has not.

  One industry submission recommends that operability be reassessed before implementing any large allowable annual cut reductions.

  One public submission states that the allowable annual cut should be reduced now to avoid large future disruptions.

  An environmental group maintains that the allowable annual cut should drop immediately by at least 35 per cent because the current cut can not be maintained in the short or long term. Attempting to do otherwise will cause severe future problems.

A First Nations submission supports a 35 per cent reduction to protect limited resources, even if jobs are affected.

Related issues and processes

Comments on other ongoing government processes in the Kingcome Timber Supply Area are summarized here to indicate perspectives on issues that may influence timber supply in the future.

- **Forest Practices Code**
  An industry submission recommends that the Forest Practices Code requirements for biodiversity make maximum use of areas already excluded from the timber harvesting land base.

  A public submission states that forest companies are only improving management because the law is forcing them to. The Forest Practices Code must be enforced to stop exploitation of the resource for corporate profit.

- **Forest Renewal B.C.**
  An environment group asserts that Forest Renewal B.C. is available to create jobs. The proportion of money taken from the Kingcome Timber Supply Area for Forest Renewal B.C. should be monitored to ensure that an equal proportion flows back to support jobs in the timber supply area.

  A public submission urges that Forest Renewal money be spent on silviculture in neglected areas, rather than on alternative logging practices and manufacturing.

- **Forest Service policies**
  An industry submission emphasizes the need for a more flexible approach to community needs and issues, such as that allowed by Forest Service policies regarding tree farm licence management planning.

Appendix 1

Submissions received by the Port McNeill Forest District

Local government
District of Campbell River
District of Hope
District of North Cowichan
District of Port Hardy
Regional District of Mount Waddington
Regional Economic Development Commission
Town of Port McNeill

Industry
Coast Forest and Lumber Association (a letter and *Kingcome Timber Supply Area Timber Supply Review Choices for AAC: 1995-2000*)
International Forest Products Limited (two letters, the *Kingcome TSA Timber Supply Review Audit*, the *Kingcome Timber Supply Area Timber Supply Review Choices for AAC: 1995-2000*, three technical submissions and several maps)
Lukwa Mills Ltd. (*Discussion Paper* response form)
Mill & Timber Products Ltd.
Richmond Plywood Corporation Limited
Shushartie Logs Sales Ltd.
Truck Loggers Association
Western Forest Products Limited

Interest groups
Sierra Club of British Columbia

Community Groups
Mount Waddington Community Resource Board

First Nations
Musgamagw Tsawataineuk Tribal Council

Individuals
Four *Discussion Paper* response forms